

Rev. Rul. 74-497, 1974-2 C.B. 383

A nonexempt charitable trust described in section 4947(a)(1) of the Internal Revenue Code of 1954 has unrelated business income as defined in section 681(a) on which a tax is imposed under section 641(a). Held, the gross investment income of the trust for purposes of determining the excise tax based on investment income under section 4940 does not include the trust's unrelated business income which is taxable under section 641(a).